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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,
Individual and Representative Plaintiffs,
v.
META PLATFORMS, INC., a Delaware
corporation;
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF KYANNA SABANOGLU IN
SUPPORT OF META'S UNOPPOSED
ADMINISTRATIVE MOTION TO FILE UNDER
SEAL PORTIONS OF JOINT LETTER BRIEFS
AND SUPPORTING EVIDENCE (DKTS. 334,
335, & 336)**

I, Kyanna Sabanoglu, hereby declare:

1. I am Associate General Counsel, IP for Defendant, Meta Platforms, Inc. I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would testify competently thereto.

2. I make this declaration in support of Meta's administrative motion to file under seal portions of the Joint Letter Brief Regarding Mitigation Privilege ("Privilege Joint Letter Brief"), the Joint Letter Brief Regarding Sy Choudhury's Deposition ("Choudhury Joint Letter Brief"), and the Joint Letter Brief Regarding 30(b)(6) Preparation ("30(b)(6) Joint Letter Brief") (collectively, the "Joint Letter Briefs") and corresponding supporting evidence. The motion seeks to have the following partially sealed or entirely sealed:

Document	Sealing Request
Choudhury Joint Letter Brief (Dkt. 334)	• Redacted portions
Exhibit A to the Choudhury Joint Letter Brief (Dkt. 334-1)	• Entire document
Exhibit B to the Choudhury Joint Letter Brief (Dkt. 334-2)	• Entire document
Exhibit 1 to the Choudhury Joint Letter Brief (Dkt. 334-4)	• Entire document
Exhibit 2 to the Choudhury Joint Letter Brief (Dkt. 334-5)	• Entire document
Exhibit 3 to the Choudhury Joint Letter Brief (Dkt. 334-6)	• Entire document
Declaration of Sy Choudhury In Support of Choudhury Joint Letter Brief ("Choudhury Declaration") (Dkt. 334-8)	• Redacted portions
Declaration of Mo Metanat In Support of Choudhury Joint Letter Brief ("Metanat Declaration") (Dkt. 334-9)	• Redacted portions
30(b)(6) Joint Letter Brief (Dkt. 335)	• Redacted portions
Exhibit A to 30(b)(6) Joint Letter Brief (Dkt. 335-1)	• Entire document
Exhibit B to 30(b)(6) Joint Letter Brief (Dkt. 335-2)	• Entire document
Exhibit C to 30(b)(6) Joint Letter Brief (Dkt. 335-3)	• Entire document
Exhibit F to 30(b)(6) Joint Letter Brief (Dkt. 335-6)	• Entire document
Exhibit H to 30(b)(6) Joint Letter Brief (Dkt. 335-8)	• Entire document

Exhibit I to 30(b)(6) Joint Letter Brief (Dkt. 335-9)	<ul style="list-style-type: none"> Entire document
Privilege Joint Letter Brief (Dkt. 336)	<ul style="list-style-type: none"> Redacted portions
Exhibit A to Privilege Joint Letter Brief (Dkt. 336-1)	<ul style="list-style-type: none"> Redacted portions
Exhibit B to Privilege Joint Letter Brief (Dkt. 336-2)	<ul style="list-style-type: none"> Entire document
Exhibit D to Privilege Joint Letter Brief (Dkt. 336-4)	<ul style="list-style-type: none"> Entire document
Exhibit E to Privilege Joint Letter Brief (Dkt. 336-5)	<ul style="list-style-type: none"> Entire document

3. The redacted portions of the Choudhury Joint Letter Brief contain significant discussion and descriptions, including quotes from deposition transcripts of Meta employees, of Meta’s highly confidential business strategies and business decisions relating to its generative AI models.

4. The redacted portions of the Choudhury Declaration and Metanat Declaration similarly contains a discussion of Meta’s highly confidential business strategies and business decisions relating to its generative AI models.

5. Exhibits A, B, 1, 2, and 3 to the Choudhury Joint Letter Brief are excerpts from depositions of Meta employees, marked “Highly Confidential – Attorneys’ Eyes Only.” These deposition transcripts discuss the highly sensitive and confidential business strategies and decisions referenced in the Choudhury Joint Letter Brief and the Choudhury and Metanat Declarations.

6. Exhibits A, B, C, F, H, and I to the 30(b)(6) Joint Letter Brief are excerpts from depositions of Meta employees, marked “Highly Confidential – Attorneys’ Eyes Only.” These excerpts discuss highly confidential information relating to the datasets used to train Meta’s AI models and Meta’s use of those datasets.

7. The redacted portions of the 30(b)(6) Joint Letter Brief contain significant discussion and descriptions, including quotes from the deposition transcripts themselves, of the information contained in A, B, C, F, H, and I to the 30(b)(6) Joint Letter Brief.

8. The redacted portions of the Privilege Joint Letter Brief discuss Meta’s highly sensitive, confidential practices and processes surrounding its Llama models and the datasets used

1 to train the models. It includes descriptions of, and quotes from, Meta confidential documents and
2 deposition testimony from Meta employees marked “Highly Confidential – Attorneys’ Eyes Only.”

3 9. The redacted portions of Exhibit A to the Privilege Joint Letter Brief is Meta’s
4 response to Plaintiffs’ Interrogatory No. 1, which includes detailed technical discussion concerning
5 Meta’s generative AI models and the data used to train them.

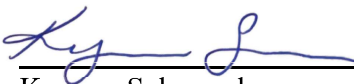
6 10. Exhibit B, D, and E to the Privilege Joint Letter Brief are excerpts from depositions
7 of Meta employees, marked “Highly Confidential – Attorneys’ Eyes Only,” that similarly discuss
8 Meta’s highly sensitive, confidential practices and processes surrounding its Llama models and the
9 datasets used to train the models.

10 11. Public disclosure of the information contained in the redacted portions of the Joint
11 Letter Briefs and the corresponding exhibits and declarations exposes Meta to the risk of
12 competitive harm by revealing Meta’s non-public business strategies, technical details, and trade
13 secret information pertaining to its generative AI offerings. For this reason, Meta takes steps to
14 carefully protect the confidentiality of this sort of information.

15 12. To the extent the materials Meta seeks to seal include non-confidential background
16 information, sealing of such information within the context of Meta’s Opposition and proposed
17 amended complaint is necessary to maintain the confidentiality of Meta’s protected information, as
18 the discussion necessarily implies conduct by Meta which is highly sensitive, non-public, and
19 which Meta has taken steps to keep confidential. Accordingly, this sealing request is critical to
20 protecting Meta’s confidential sensitive technical and competitive information.

21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct.

23 Executed in New York, New York on this 12th day of December, 2024.

24
25 
26 Kyanna Sabanoglu